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Attorneys for Creditor  
GER HOSPITALITY, LLC

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

Bankruptcy Case

No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF FRANCIS O.  
SCARPULLA IN SUPPORT OF MOTION  
OF CREDITOR GER HOSPITALITY, LLC  
PURSUANT TO FED. R. BANKR. P. 9023  
FOR RECONSIDERATION OF APRIL 30,  
2020 ORDER GRANTING MOTION TO  
EXPUNGE CLASS PROOF OF CLAIM  
(DOC. 7022)**

I, Francis O. Scarpulla, declare as follows:

1. This Declaration is made in support of Creditor GER Hospitality, LLC's Motion for Reconsideration of April 30, 2020 Order Granting Motion to Expunge Class Proof of Claim.

2. I am counsel of record for GER. I am an attorney licensed to practice before the Supreme Court of the State of California and all inferior California State Courts, as well as the Supreme Court of the United States and many inferior federal courts, including the United States District Court for the Northern District of California. I am the proprietor of the Law Offices of Francis O. Scarpulla. I have personal knowledge of the facts stated in this Declaration and, if called as a witness, I could and would testify competently to them.

3. Attached hereto as Exhibit A is a true and correct copy of a Stipulation which was negotiated by counsel for the moving party, which we planned on submitting to the Court and, based thereon, to request that the motion be vacated. On April 25, 2020, this Court vacated oral argument on the matter and took it under submission. I sent my signature page to counsel for the moving on April 29, 2020; my co-counsel, Jeremiah Hallisey, sent his signature page on May 1, 2020. On April 30, 2020, this Court granted the motion before this Stipulation could be filed.

4. I suggested to counsel for the moving party that we either: (1) inform this Court of this Stipulation and request that the order be vacated; or (2) notice an appeal and present the Stipulation to the Article III Judge in the Northern District of California; or (3) contact Judge Trotter and inform him of the Stipulation and ascertain if he would be able to use a class claim procedure at the end of the case for any unrepresented claimants so that they could be compensated for their losses.

5. Counsel for the moving parties eventually told me that they would agree to apply the Stipulation to all of the class claims, except GER's class claim, because this Court already ruled on that motion.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 13th day of May, 2020 at San Francisco, California.

By: /s/ Francis O. Scarpulla  
Francis O. Scarpulla